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Subject: Gorge Dam - Jacobs Comments on Summit Metro Wetland Delineation Report
Date: Monday, February 03, 2020 11:08:13 AM
Attachments: [image001.png](#)

Mart Beth and Karla – Jacobs recommendations/comments on the Gorge Dam Removal Wetlands and Other Waters Delineation Report are listed below in blue. These recommendations are meant to verify the report is adequate for Clean Water Act 404 and 401 permitting purposes. Please reach out if you have any questions or concerns.

Global Comment

- Ideally, the report will focus on the actual/potential impact area and exclude areas that are not relevant. This could help to reduce the amount of additional documentation that needs to be provided. Areas included in any alternatives analysis for sediment disposal areas/methods/routes would also need to be included in the delineation report.

PDF Page 2 - “performed according to current federal and state standards”

- Recommend stating that wetland delineation methodology was in accordance with the Corps of Engineers Wetland Delineation Manual (Environmental Laboratory, 1987), and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral Northeast Region (Version 2.0) (USACE, 2012). Or, what other methods were used.
- Recommend stating that WOUS delineation was in accordance with 33 CFR 328.3, the Corps of Engineers Wetland Delineation Manual (Environmental Laboratory, 1987), and Regulatory Guidance Letter 05-05. Or, what other methods were used.
- Recommend reference to what type of equipment was used to collect geospatial data. State that geospatial data collection had submeter accuracy (if true).

PDF Page 2 - “making this study largely an update of existing data”

- Recommend stating the extent to which the 2019 survey was an update of existing data (i.e. were all resource boundaries walked? Were new data points taken within all previously mapped features?, etc.).
- At a minimum all aquatic resources that will or could be temporarily/permanently affected should be updated.
- Recommend at a minimum updating/creating wetland determination data forms (at paired upland plot and wetland plots) and verifying wetland boundaries for all wetlands that will or could be temporarily/permanently affected by the project.

PDF Page 3 - “Thirteen point-in, point-out wetland determination sample plots were established along a diverse assemblage of habitat boundaries to provide evidence of how the wetlands delineation was performed

- USACE will require two sample plots (upland plot, wetland plot) for each wetland identified.
- Recommend at a minimum including wetland determination data forms (at upland plot

and wetland plots) for all wetlands that will or could be temporarily/permanently affected by the project.

PDF Page 3 - "(Wetland CV009) is a 5.5-acre marginal (70%) wetland"

- Recommend clarifying "marginal" and 70%. Does this mean that 70% of the area delineated meets USACE criteria?

PDF Page 3 - "All wetlands were evaluated using Ohio EPA's Ohio Rapid Assessment Method protocol."

- OEPA will require 10-page data sheets be included in the permit application.
- Recommend taking data in ORAM appendix and converting to 10-page data sheets.

PDF Page 3 - "PHWH stream sections were each evaluated using Ohio EPA's Headwater Evaluation Index..."

- OEPA will require data sheets for each identified headwater stream.
- Recommend at a minimum including HHEI data sheets for all streams that will or could be temporarily/permanently affected by the project.

PDF Page 3 - "the QHEI protocol was additionally used for Babb Run, and by the Ohio EPA for the Cuyahoga River..."

- OEPA will require QHEI Data sheets for each of these streams.
- Recommend at a minimum including QHEI data sheets for all streams that will or could be temporarily/permanently affected by the project.
- Recommend clarifying if referencing a QHEI completed by OEPA for the affected reach for this project or possibly as part of an OEPA biological/water quality study for the river.

PDF Pages 25 through 30 - Study Area

- Does the Study Area encompass all potential impact areas? The Study Area should be inclusive of all potential staging areas, access routes, hydraulic pipeline routes, job trailers, etc. It appears there is an area west of GO006 which may be used for the hydraulic pipeline route that was not included in the Study Area.
- Recommend updating the delineation report as necessary if any additional areas may be impacted.

PDF Page 34 - Hydric Soil

- Recommend updating the Hydric Soil column to identify if field indicators of hydric soils were met at the sample plot.

PDF Pages 35 through 37 - Wetlands and Other Waters Data Table

- OEPA will require 10-page data sheets.
- Recommend taking data in ORAM appendix and converting to 10-page data sheets.
- Recommend clarifying "Percentage Jurisdictional" column.
- Recommend clarifying features that are listed as "100% jurisdictional", but also "Non-jurisdictional" in Estimated Jurisdiction column.

PDF Pages 38 through 39 - Streams and Rivers Data Table

- OEPA will require QHEI/HHEI Data sheets for each of these streams.
- Recommend at a minimum including QHEI data sheets for all streams that will or could be temporarily/permanently affected by the project.

PDF Pages 41 through 80 - Data Forms

- USACE typically requires that the forms and all parts of the application (photos are one possible exception) are reproducible in B/W. USACE and OEPA may have concerns over legibility. Recommend typing/using electronic data forms, available here: <https://www.nae.usace.army.mil/Missions/Regulatory/Jurisdiction-and-Wetlands/Wetland-Delineation-Manual/>.
- Recommend spelling out complete species names (SP1, SP10).
- Recommend including section, range, township (all data forms).
- Recommend indicating if climatic/hydrologic conditions are typical (SP6).
- Recommend including lat/long and datum (SP5, SP6, SP7, SP8, SP9, SP10, SP11, SP12, SP13).
- Recommend including depth of hydrology field observations (SP1).
- Recommend including soil matrix percentages and/or textures (SP1, SP2, SP5, SP7, SP8, SP9, SP12).
- SP4 does not meet hydric soil indicator A12.
- SP4 does not meet hydric soil indicator F2.
- Recommend revising soil textures for SP4 and revising soil indicators as necessary.
- Recommend checking "no" in hydrology "field observations" box for SP8.
- Recommend revising soils for SP11. Indicate hydric soil present and explain in remarks. Check if this meets indicator F22.
- Recommend revising soils for SP13. Indicate type of impenetrable layer and explain in remarks.

PDF Pages 84, 86

- Recommend including drawing of stream reach with locations of riffles, runs, glides, pools, riparian habitat types, in-stream features, etc.

PDF Pages 88-115

- Recommend at a minimum including four photos (each of the cardinal directions) for all wetlands that will or could be temporarily/permanently affected by the project. See OAC 3745-32-03(B)(e).
- Recommend at a minimum including three photos (upstream, downstream, substrate) for all streams that will or could be temporarily/permanently affected by the project. See OAC 3745-32-03(B)(e).

Cheers!

Bill

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